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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

AVIATION WEST CHARTERS, LLC D/B/A  
ANGEL MEDFLIGHT, et al.

Plaintiffs,

vs.

CONNECTICUT GENERAL LIFE INSURANCE  
COMPANY

Defendant.

CASE NO. 3:16-cv-00035-WHA  
Order re:

**JOINT STIPULATION TO  
FURTHER EXTEND DEADLINE  
TO RESPOND TO COMPLAINT  
(CIVIL L.R. 16(e) AND 6-1(a))**

Complaint Filed: January 11, 2016

1 TO THE HONORABLE COURT:

2 The parties hereto, Plaintiffs AVIATION WEST CHARTERS, LLC d/b/a ANGEL  
3 MEDFLIGHT and ERIN GAAL (collectively "Plaintiffs") and Defendant CONNECTICUT  
4 GENERAL LIFE INSURANCE COMPANY ("CIGNA"), by and through their respective  
5 counsel of record, hereby stipulate as follows:

6 WHEREAS, Plaintiffs filed their Complaint on January 5, 2016, and served CIGNA with  
7 the Summons and Complaint on January 8, 2016.

8 WHEREAS, following joint stipulations, CIGNA's deadline to file a response to the  
9 Complaint was extended to April 22, 2016, based on the Parties' agreement to conduct an early  
10 mediation on March 31, 2016 with Judge Edward Infante (Ret.) to attempt to resolve this case  
11 and potentially resolve other, related claim disputes in their entirety.

12 WHEREAS, following entry of the Court's March 10, 2016 order continuing the initial  
13 Case Management Conference and CIGNA's responsive pleading filing deadline, the Parties  
14 engaged in further discussions concerning the scope of and process for mediation and ultimately  
15 agreed that they will attempt to resolve thirteen (13) distinct, disputed claims at the mediation,  
16 including this matter.

17 WHEREAS, given the time required for the Parties to reach an agreement on which  
18 claims would be addressed at the mediation, and the complexities of the thirteen disputed claims  
19 that will be at issue, it has taken longer than anticipated to prepare for the mediation, and the  
20 Parties agreed to move the mediation date to May 4, 2016 to allow sufficient time to adequately  
21 prepare and ensure a meaningful attempt at resolution.

22 WHEREAS, the Parties are simultaneously filing with this Stipulation their Rule 26 joint  
23 report, but agree that sufficient time should be allowed post-mediation to permit resolution  
24 efforts to continue and, if the Parties are unable to resolve their disputes, to allow CIGNA  
25 adequate time to prepare its response to the Complaint.

26 WHEREAS, the Plaintiffs have agreed to further extend CIGNA's deadline to file a  
27 response to the Complaint to May 18, 2016 (two weeks after the mediation).

WHEREAS, the Parties respectfully submit that they do not believe the continuance of CIGNA's responsive pleading filing deadline will interfere with any deadline previously set by the Court, and they will be prepared to discuss all issues required under Rule 26 at the April 28, 2016 Initial Case Management Conference.

IT IS HEREBY STIPULATED by and between Plaintiffs and CIGNA through their respective counsel of record that the deadline for CIGNA to file a responsive pleading is extended up to May 18, 2016.

IT IS SO STIPULATED

Dated: April 21, 2016

CARTER WOLDEN CURTIS, LLP

By /s/ Kirk J. Wolden

Kirk J. Wolden  
Attorneys for Plaintiffs  
AVIATION WEST CHARTERS, LLC d/b/a  
ANGEL MEDFLIGHT and ERIN GAAL

Dated: April 21, 2016

GORDON & REES LLP

By /s/ Tino X. Do

Jordan S. Altura  
Tino X. Do  
Attorneys for Defendant  
CONNECTICUT GENERAL LIFE INSURANCE  
COMPANY

**ATTESTATION OF E-FILED SIGNATURE**

I, Jordan S. Altura, am the ECF user whose ID and password are being used to file this Joint Stipulation to Further Extend Deadline to Respond to Complaint. In compliance with Local Rule 5-1(i), I hereby attest that Kirk J. Wolden, counsel for Plaintiffs, has concurred in this filing.

Dated: April 21, 2016

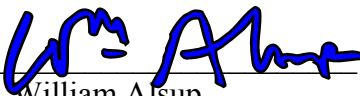
/s/ Tino X. Do  
Tino X. Do

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**PROPOSED ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant Connecticut General Life Insurance Company file its response to Plaintiffs' Complaint by May 18, 2016 in the event this case is not resolved at the May 4, 2016 mediation.

Dated: April 22, 2016.

  
Hon. William Alsup  
United States District Judge

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